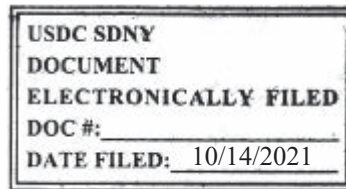




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October 12, 2021



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VIA ECF

Judge Alison J. Nathan  
United States District Judge  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007

**Re: *Bobcar Media LLC v. Deutsche Telekom AG et al.*, 1:21-cv-05685-AJN (S.D.N.Y.)**

Dear Judge Nathan:

This firm represents T-Mobile USA, Inc. ("T-Mobile") in the above-referenced action. I write to request that T-Mobile and Samsung Electronics America, Inc. ("Samsung") be given a 60-day extension to move, answer, or otherwise respond to Plaintiff's complaint. Defendants T-Mobile and Samsung were served on September 21, making their responses due October 12. T-Mobile's and Samsung's respective foreign affiliates, Deutsche Telekom and Samsung Electronics Co. Ltd. have not yet been served. With the extension, the response date would be December 13. In addition, the Court has an initial pretrial conference scheduled for November 5, 2021; an adjournment of that date until after December 13 is respectfully requested as well. In terms of a new date for the conference, counsel for Plaintiff has advised us that he is unavailable for a conference from December 13 - January 3rd, due to a trial and subsequent travel plans overseas.

Granting the extension will allow the parties to attempt to negotiate a disposition for the foreign affiliates without burdening the court with motion practice. This is the first request for an extension of time to answer. Counsel for Plaintiff has consented to the extension.

Respectfully submitted,

/s/ Martin E. Gilmore

Martin E. Gilmore

cc: counsel of record via ECF  
Timothy Jezek, in-house counsel

Defendants' request to extend the deadline to file a response to December 13, 2021, is GRANTED. The conference scheduled for November 5, 2021, is adjourned to January 21, 2022, at 3:15 p.m.  
  
SO ORDERED.

10/14/2021